

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

D-1 John Christopher Colletti,

Defendant.

_____ /

Case: 2:21-cr-20131

Assigned To : Parker, Linda V.

Referral Judge: Altman, Kimberly G.

Assign. Date : 3/1/2021

Description: INFO USA V. COLLETTI (NA)

Violations:

18 U.S.C. § 1343

18 U.S.C. § 1028A

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Information:

1. Global Payments Inc. is a company headquartered in Atlanta, Georgia.
2. Global Payments Gaming Services Inc. (GPGS), located in Las Vegas, Nevada, is a wholly-owned subsidiary of Global Payments Inc.
3. GPGS offers casinos a comprehensive suite of gaming services, to include a variety of full-service, end-to-end kiosk solutions, collectively known herein as Global Payment kiosks (GPK). GPKs are self-service booths located on the gaming floor of various casinos, offering ticket exchanges, bill-breaking, jackpot processing, e-check, automated teller machine (ATM), and cash advance capabilities.

4. In order to use a GPK, a casino patron must first enroll in Global Payments' VIP Preferred Program. Establishing a VIP Preferred profile requires identity verification and the submission of certain financial information. GPK access thereafter requires multi-factor authentication, to include the patron's driver's license, the last four digits of their Social Security Number, and the last four digits of their telephone number

5. With the GPK e-check option, VIP Preferred patrons obtain the ability to make withdrawals (cleared the next business day) up to a revolving seven-day limit, from up to four of their own checking accounts. Patrons participating in the VIP Preferred Program are given varying withdrawal limits on their account, based on factors reviewed during enrollment.

6. All GPK transaction settlements are transmitted via interstate wire to Global Payments' host systems in Atlanta and all secured output files are stored at an operations office in Niles, Illinois.

COUNT ONE
18 U.S.C. § 1343 - Wire Fraud

D-1 John Christopher Colletti

7. The allegations in paragraphs 1 through 6 are incorporated into these counts by reference.

8. Beginning in or around April 26, 2019, and continuing through March 12, 2020, in the Eastern District of Michigan, Southern Division, and elsewhere,

the Defendant, John Christopher Colletti, with the intent to defraud, knowingly devised and executed a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses and representations.

9. The purpose of the scheme and artifice to defraud was for Defendant to obtain money from the accounts of Global Payments' VIP Preferred Program patrons.

10. It was part of the scheme and artifice that Defendant would use GPKs to make withdrawals from victims' personal bank accounts.

11. It was further a part of the scheme and artifice that Defendant would use counterfeit driver's licenses and other personally identifiable information (PII) to log into victims' accounts.

12. It was further a part of the scheme and artifice that Defendant would dress in elaborate disguises, to include the use of full prosthetic facemasks, in order to conceal his identity while using the GPKs.

13. On or about the dates set forth below, in the Eastern District of Michigan, for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, Defendant knowingly transmitted and caused the transmission by means of wire radio, or television communication in interstate or foreign commerce, the following writings, signs, signal, pictures, and sounds; with each transmission being a separate count of the Information:

<u>Count</u>	<u>Date of Transaction(s)</u>	<u>Casino</u>	<u>Victim</u>	<u>Amount Withdrawn</u>
1	5/23/2019	MGM Grand	A.O.	\$30,000.00

14. All in violation of Title 18, United States Code, Section 1343.

COUNT TWO
18 U.S.C. § 1028A

D-1 John Christopher Colletti

15. The allegations in paragraphs 1 - 14 are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

16. On or about the dates listed below, in Eastern District of Michigan, Southern Division, Defendant John Christopher Colletti, did knowingly possess, use and transfer, without lawful authority, one or more means of identification of another person—that is, their names, driver’s license numbers, and the last-four digits of their Social Security Numbers—during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: Wire Fraud, in violation of 18 U.S.C § 1343, knowing that the means of identification belonged to another actual person; in violation of Title 18, United States Code, Section 1028A(a)(1).

<u>Count</u>	<u>Date of Use</u>	<u>Victim</u>	<u>Nature of Use</u>
2	5/23/2019	A.O.	Account access

17. All in violation of Title 18, United States Code, Section 1028A.

FORFEITURE ALLEGATION

18. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto; all property that facilitated the commission of the violations alleged in this Information, or property traceable thereto; and all property involved in, or property traceable thereto, the violations set forth in this Information.

19. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of Defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

20. Money Judgment: Upon conviction of the violations alleged in Count 1 of this Information, the United States will seek a forfeiture money judgment against the Defendant in an amount equal to the total amount of proceeds obtained

as a result of the Defendant's violations of Title 18, United States Code, Section 1343 as alleged in this Information.

SAIMA S. MOHSIN
Acting United States Attorney

s/John K. Neal

JOHN K. NEAL
Chief, White Collar Crimes

s/Ryan A. Particka

RYAN A. PARTICKA
Assistant U.S. Attorney

Dated: March 1, 2021

United States District Court
Eastern District of Michigan

Criminal Case Cover Sheet

Case Number
21-20131

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. John Christopher Colletti

County where offense occurred : Wayne and elsewhere

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☒ Information --- based upon prior complaint [Case number: 20-mj-30255]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 1, 2021
Date

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 Ryan A. Particka
 Assistant United States Attorney
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 Attorney Bar #:

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.